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BULLETPROOFING DECISION DOCUMENTS

Presenters

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Bulletproofing

- Intent - Get it right the first time
- What does it mean - withstand
Washington level review
- Why - not accounted for in PMP
 - Time
 - Costs

Decision Documents

- **Types**
- **Feasibility**
 - **GRR**
 - **LRR**
- **Major rehabilitation**
- **Dam safety**
- **PAC**
- **902**
- **EA/EIS**

Problems - the 4 C's

- **Content**
- **Consistency**
- **Components**
- **Compartmentalization**

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Examples of the 4 C's

The following slides give a sample of bulletproofing reviews.

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Content

Definition: Perhaps this should be labeled clarity. Corps guidance requires that the content of the report be clear and understandable.

Example of Content

If the disposal area is a LPP GNF, the sponsor is responsible for the extra expense, but O&M would be Federal. The cost sharing for environmental restoration, if a least cost project feature, is 65:35 less any LERRD. If the environmental restoration is the LPP, then the non-Federal sponsor is responsible for the difference and for the O&M. (See page E-288, ER 1105-2-100.)

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Example of Content

Engineering Appendix, paragraph 3.4.2.9. The basic question is what quantity meets the requirements for mitigation. The concern is that the basis for 3 to 1 mitigation should be provided. ER 1105-2-100, paragraph C-3.b(12) addresses mitigation but gives no specific rules. For compensation, it says replace in-kind. This does not appear to be in-kind in terms of quantity. For substitution it should be of equal value and significance as the resource lost. The basis of project costs needs to be presented. The resolution to the comment should probably be in the main report under mitigation as well as in the EIS.

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Example of Content

The text claims that surf zone disposal is a beneficial use. The problem with this is that if other beneficial use sites are more expensive, they could require cost sharing.

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Example of Content

EIS, paragraph 4.1.3. There is a discussion of the beneficial use sites lowering turbidity. The presentation is without support and appears to be opinion. If it is an educated opinion, that is fine as long as the basis is presented. As this would be an important element of the disposal area, it merits a fuller discussion. If the treatment can only be qualitative, the trade offs between turbidity (sediment transport) and nutrient/food dispersion should be addressed in the speculation.

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Consistency

Definition: The main report, executive summary and appendices should all be consistent within and between themselves

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Example of Consistency

The cost shown for dredging in the engineering appendix is not the same as that shown in the executive summary.

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Component

Definition: In the context of the presentation, component relates to information or material that should be included. Equally, it relates to information that should be excluded.

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Example of Component

Opportunity or Trap. The reduction in delay benefits was first derived from model studies, only to be adjusted by pilot interviews. Why conduct expensive simulations if they are not reliable? How can you pick and choose which simulation results you will use and which you will ignore? By adjusting the model results you are almost doubling the benefits. ER 1105-2-100, paragraph 4-3.b(2). cc

Example of Component

Section 905 of the Water Resources Development Act of 1986 requires consideration of non-structural alternatives (also see paragraphs 2-3.c.(1) and (5) of ER 1105-2-100). In the case of the reach of the Gulf Intracoastal Waterway intersecting the deep-draft Matagorda Ship Channel, there are three potential non-structural alternatives: assisting towboats, limiting tows to one barge per tow, and requiring towboats of a minimum horsepower. However, no non-structural alternatives are mentioned. Non-structural alternatives that might be expected in the future without conditions should be discussed as minimum (Paragraph E-9.c.(1)(a) of ER 1165-2-100).

Example of Component

Completeness. ER 1130-2-520 addresses advance maintenance dredging and notes that MSC commanders are authorized to approve such for both new work and maintenance. However, justification is required (Paragraph 8-2.a.(7)).

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Compartmentalization

Definition:

Compartmentalization relates to a “discipline presentation playing to your audience” at the expense of the reporting requirements.

Example of Compartmentalization

There is no summary of tow simulation in terms of the tow sizes, meetings, results or optimization of alignment except to say that “wide turns were determined.” This information should be provided as it is the basis for channel dimensions (and project cost)(paragraph G-6.g. ER 1165-2-100).

Example of Compartmentalization

EIS, page 3-85. This section on ground transportation provides an extensive list of major roads and yet rail transportation is ignored. Rail transportation links and major highways to and from Corpus Christi directly relate to the project and yet the draft gives city roads that don't relate to the project in terms of serving and capacity.

Remaining Points

Example of Technical versus Policy Review.

Origin/destination port pairing depths should be provided to assure the decision makers (ER 1105-2-100, paragraph G-9.a(3)) that all costs for loading and loading practices are accounted for. As recent as the 1990s several major Latin American liquid and dry bulk ports did not have channel depths to support larger ships.

Remaining Points

ITR

- **Role**
- **Relative to Washington level review**

Information Transfer

After successful application to several Galveston studies, the District introduced the bulletproofing concept to planners from the rest of the Southwestern Division. Two 1-day pilot seminars were held in January 2004 in Dallas. The seminar has since been refined to include class exercises.

Conclusion

Policy review is performed as part of the Washington level review process (HQUSACE, ASA(CW) and OMB) in order to assure uniformity of treatment to all candidate projects. A bulletproofing concept is designed to keep the study “between the plan formulation lines.” Review of the draft report is to catch problems before the decision document gets to the Washington level.